

Raleigh C. Thompson, NV Bar No. 11296
Ryan M. Lower, NV Bar No. 9108
MORRIS LAW GROUP
411 E. Bonneville Ave., Suite 360
Las Vegas, Nevada 89101
Telephone: (702) 474-9400
rct@morrislawgroup.com
rml@morrislawgroup.com

Attorneys for Defendant
Professional Credit Services, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MOHARRAM JAFARIAN,)	Case No. 2:17-cv-03132-APG-CWH
)	
Plaintiff,)	
)	
v.)	STIPULATION AND ORDER TO
)	EXTEND TIME TO RESPOND TO
)	COMPLAINT
CASHCALL INC.; EQUIFAX)	
INFORMATION SERVICES,)	
LLC.; EXPERIAN)	(FIRST REQUEST)
INFORMATION SOLUTIONS,)	
INC.; PROFESSIONAL CREDIT)	
SERVICES, INC.; SUN LOAN)	
CO.; and TRANS UNION, LLC,)	
)	
Defendants.)	

Pursuant to Local Rules IA 6-1(a), 6-2 and 7-1, and Federal Rule of Civil Procedure 6(b), defendant Professional Credit Services ("Defendant") and plaintiff Moharram Jafarian ("Plaintiff"), by and through their respective counsel of record, hereby stipulate as follows:

Defendant has requested, and Plaintiff has consented to, an extension of the time for Defendant to respond to Plaintiff's Complaint (ECF No. 1, filed on December 29, 2017) from February 1, 2018 to February 15, 2018.

Rule 6(b) requires the Court to approve an extension of time for Defendant to file an answer, and therefore the Parties collectively request the Court approve the agreement, as set forth below:

a. This is the Parties' first stipulation for an enlargement of time to respond to the Complaint;

b. The Parties stipulate and agree that the deadline for Defendant to file an answer or otherwise respond to Plaintiff's Complaint shall be extended to on or before February 15, 2018; and

c. Defendant requested this extension to give its counsel sufficient time to meaningfully assess Plaintiff's claims before responding to the Complaint. This stipulation is not made for purposes of delay.

By /s/ Raleigh C. Thompson
Raleigh C. Thompson, Bar 11296
Ryan M. Lower, Bar 9108
MORRIS LAW GROUP
411 E. Bonneville Ave., Suite 360
Las Vegas, Nevada 89101

Attorneys for Defendant
Professional Credit Services, Inc.

By /s/ Miles N. Clark
Matthew I. Knepper, Bar 12796
Miles N. Clark, Bar 13848
KNEPPER & CLARK LLC
10040 W. Cheyenne Ave. #170-109
Las Vegas, NV 89129

David H. Krieger, Bar 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123

Attorneys for Plaintiff
Moharram Jafarian

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED February 1, 2018